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From Transit Country to Destination: The Road to Refugee and Asylum Seekers' Integration in Greece

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Although the EU is not a novice recipient of migration waves, due to the *sui generis* format of its multi-governance system, combining supranational with state level policy making, it lacks an effective common policy that could be implemented at the supranational level. The EU migration regime is the result of interactions among an array of different actors including EU institutions, EU member states, states belonging to the Schengen Zone and non-state actors (D'Amato and Lucarelli 2019). The paradox of an applied common European immigration and asylum policy lies in the fact that although under the Treaties, the EU is competent to develop a common procedure, EU level provisions remain only complementary to state level immigration law, as EU member states retain the right to adopt only the more favorable regulations to their national interests, as well as, to control the volumes of admissions of third country nationals (TNCs) (Strumia 2016).

Migration was long perceived as a secondary concern for the EU. In fact, migration governance has been largely viewed as a security issue mainly in response to internal and external challenges to EU security including the migrant 'crisis' and its often undermining implications for the implementation and functioning of the Schengen Accord, as well as terrorist attacks on European soil (Ceccorulli and Lucarelli 2017). For example, although the topic of migration is not perceived nor discussed as a security threat *per se* in the European Union Global Strategy (EUGS) (European Union External Action 2019) or in any previous EU migration related document, like the European Security Strategy of 2003 (European Council 2009), in the EUGS, migration is most frequently mentioned in reference to 'foreign policy objectives (including internal repercussions), geographical areas and the purported values of the European Union' (Ceccorulli and Lucarelli 2017, 84). As a result, migration governance has revolved around deterrence of irregular migration and protection of the EU's external borders, rather than integration.

Greece has been at the forefront of the 'migrant crisis' as it lies along one of the main migratory routes to the EU. The combination of a prolonged period of strict economic austerity measures, political and social turmoil dating back to the signing of the first Memorandum of Understanding (MoU) in 2010, and an insufficient migration policy left the country severely ill-equipped to deal with rising numbers of irregular migrants, the majority of whom crossed from Turkey to Greece via the Aegean Sea. Initially a transit country, after the signing of the EU-Turkey Statement (European Council 2016) in March 2016, Greece became a destination country. Indicatively, according to official statistics, the numbers of asylum applications in the country went up by 236.4 per cent immediately after the agreement came into force in April 2016 in relation to asylum applications submitted in 2015 (Ministry of Interior 2016).

Even though the state has undoubtedly always been central in decision-making, after 2014 the role of the UNHCR has equally been pivotal in the coordination of activities accommodating the needs of asylum seekers, as well as, in supervising housing programs. Alongside the UNHCR, several international nongovernmental organizations (INGOs)

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dealing with migration related issues became involved in migration governance in Greece, together with local non-governmental organizations (NGOs) which were created driven by demand and availability of funding mainly from the EU. INGOs and national NGOs have been offering services to mixed flows of migrants in Greece spanning from medical on-site assistance, informal education, building of labor skills, assistance with state bureaucracy, legal advice and interpreters, to name but a few. The imminent departure of the UNHCR from the country and the end of international funding signifies that national NGOs, which are central to migration governance, will struggle to survive. In the current transitional period, the state is called in to fill in these gaps. Thus, one of the catalysts that defines the format and the quality of the state's response to refugee and asylum seekers' integration in Greece is the way the state is taking over supervision and coordination of the operations and integration programs from the departing organizations, while, at the same time, attempting to address the gaps in their administration.

We examine the legislative evolution in Greek integration law within the framework of EU policy, before and after the post-2014 migrant 'crisis' caused by the Syrian conflict as Greece moved from a transit to a destination country. We contend that while there has been an attempt to create a normative and policy framework for integration, a critical policy implementation gap still exists.

Methodology

During the last decade, literature on migration policies and response in Greece has been voluminous. In the post-2014 environment, social scientists have concentrated their research efforts on different facets of migration with regards to social integration, such as the intersection of economics, healthcare, and the migration 'crisis' (Kentikelenis 2018, 61–62; Papadakaki et al. 2017, 128–134), links between health and social integration (Rapp et al. 2018, 48–53); accessibility of services (Fouskas et al 2019, 13–28); and pathologies in the housing and education schemes (Kourachanis 2018, 1153– 1167), among others.

Legal scholars have so far appeared to be intrigued by more 'legalistic' aspects of the phenomenon. Queries related to the legal status of refugees, the harmonization of immigration law with EU prerequisites (Karamanidou 2021, 89–117), the legitimate character of detention measures (Koutsouraki 2017, 85–106), or specific subgroups of migrants who merit special treatment, such as unaccompanied minors (Kovner et al. 2021), have been regularly revisited in the Greek legal environment. While there is literature that provides legal analysis of the relevant laws, and empirical studies that employ primary data collection methods to identify barriers to migrant integration, socio-legal approaches that combine doctrinal and empirical research to identify gaps and necessary reforms in the Greek integration system are rather scarce (for an example, see Leivaditi et al. 2020).

Yet, there is value in adopting a two-pronged, socio-legal methodology in this case. On the one hand, the doctrinal legal approach is appropriately suited to the analysis of legal norms, the contribution of pertinent case law, and the understanding of the interplay of multilevel legal bodies (Cryer et al. 2011). Rooted in realism, the doctrinal legal approach seeks to provide an objective and accurate picture of the phenomenon under study, one that stands independently from the individual's understanding of the world and in opposition to a phenomenological or a social constructivist approach, which would be concerned more with the reported experiences of the relevant actors (Bryman 2012). However, a doctrinal approach does not yield insights into the practical implementation of the regulatory framework, as it does not entail the employment of any empirical methods (Dobinsons and Johns 2007). Thus, an additional non-doctrinal, socio-legal perspective was deemed suitable in order to identify the extent to which the Greek legal and policy framework on migrant integration is reflected in practice, and to allow for recommendations on law and policy reforms. The combination of the two approaches provides a holistic perspective of law as it focuses on both its 'internal' and 'external' aspects (Hart 2015; van Aeken 2011).

We address this gap by investigating Greek legislation and policies concerning integration of beneficiaries of international protection and asking whether that normative framework has been implemented. To this end, we combined desk research on the legal framework of migrant integration with data collected through in-depth interviews with professionals working in the field. The first part of the methodology included identification and analysis of relevant policies of EU and national legal and policy documents pertaining to migrant integration, in order to offer an understanding of the evolution of the normative framework on integration at the national scale and the EU

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fundamental principles on treatment of applicants and beneficiaries of international protection. This inquiry focused on three sectors of integration policy: housing, access to health, and employment. Part of adult education is included in housing through the language programs. Interculturalism and education for minors has not been included.

The second part of the methodology entailed six in-depth, online, semi-structured interviews with experts working on organizations that have played an instrumental role in migration management and integration in the country. The interviews took place between August and November 2020, and their duration ranged from 45–60 minutes. Two of them were carried out in Greek, upon the preference of those interviewees. In compliance with the General Data Protection Regulation, the interviewees remained anonymous. The selection of participants was based on the principle of purposive sampling (Bryman 2012), in accordance with two criteria, impact and diversity. Thus, the list of prospective interviewees was narrowed according to the continuity of service provision in the field of migration and the established partnerships at national and EU level, as well as their operation on a different scale (national-international-local) and through a variety of services in the areas of employability, housing, and psychosocial support.

The Evolution of Greece's Integration governance within the EU framework

The EU's integration policy in relation to migration governance has been developing steadily, over the years, since the Maastricht Treaty in 1992 with the abolition of internal borders in the EU and implementation of the Schengen Agreement in 1995. It was then that consensus for common policies on both adopting a common asylum and immigration framework, as well as strengthening policies against irregular migration were developed (Garcés-Mascareñas and Penninx 2016). In Table 1 below, a chronology of EU migrant integration policies can be seen.

The current normative framework in Greece bears the clear imprint of EU integration legislation, but this was not always the case. As Triandafyllidou has remarked, Greece was a 'latecomer in regularisation policies' for non-nationals, who were long viewed as a threat to the national identity (Triandafyllidou 2009, 162; Triandafyllidou 2001). The first Immigration Law, enacted in 2001 (Law 2910/2001), bears little resemblance to the relevant EU legal documents (Mavrodi, 2005); it was, however, the first step towards the development of a national migration framework, which gradually became oriented towards a more positive inclusive approach of legally residing TNCs.

The first account of social integration in national legislation is found in Law 3386/2005, viewed in scholarship as the first act to treat migration as a long-term phenomenon (Anagnostou 2016). In Article 65, social integration is defined as the 'proportionally equal participation' of migrants in the economic, social, and cultural life of the country, premised on the conferral of rights and the obligation to respect the founding values of the Greek society. Set out in article 66 par. 4, dominant parameters of integration are the certified knowledge of the Greek language, history and culture, access to the labor market and participation in Greek society.

The definition was revisited under a different light in the Immigration and Social Integration Code (Law 4251/2014). This law marked the first attempt to codify national migrant legislation in harmonization with the EU *acquis* and remains the main legal act regulating the integration of migrants in the country today. Pursuant to art. 128 para. 1,

Social integration policy aims at the smooth adaptation of third country nationals into the Greek society and the recognition, on behalf of the Greek society, of the possibility for an equal participation in the economic, social, and cultural life of the country. During their integration process in the Greek society, third country nationals obtain rights and obligations, like Greek citizens (Law 4251/2014).

The new provision shared few commonalities with the one it was drafted to replace. The definition still lacked the key element of mutuality that permeates the European principles, demanding adaptation only on behalf of TCNs. On a positive note, however, it explicitly equates their rights and obligations with those of Greek citizens. In general, the Code facilitates the legal sojourn of migrants in the country by simplifying the procedure for issuance of residence permits, enabling access to work, and upholding respect for cultural identity, non-discrimination, gender equality, and children's rights.

Prior to the insertion of the Immigration Code, an evolved understanding of the concept of social integration appeared

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in the text of the first National Integration Strategy adopted in 2013. Although Law 3386/2005 was still in force, the strategy endorsed the Council of Europe's definition of social integration, describing it as a 'dynamic, two-way process of mutual accommodation by all immigrants and residents of Member States' (Hellenic Ministry of Migration Policy 2013). Along similar lines, the ensuing National Integration Strategy, developed in July 2019, envisions integration as a dynamic procedure founded upon mutuality and multiculturalism aims (Hellenic Ministry of Migration Policy 2019a). Building upon the European multicultural model of social integration, it embraces the idea of open society, promotes interaction and social cohesion, and spells out rights and obligations that fall under the same restrictions imposed on the native national population (Hellenic Ministry of Migration Policy 2019a).

The update of the national integration scheme with the adoption of a new policy was highly anticipated; yet, the new Strategy was received with skepticism by civil society. At the stage of public consultation, several complaints were voiced regarding the fact that the document was drafted without prior consultation with civil society actors and migrant associations in the country. This not only deprived the latter of the opportunity to put forward instrumental suggestions, but it also clashed with the new strategy, which explicitly placed political representation among the axes of social integration. Coupled with the fact that the first strategy of 2013 established a bad precedent by remaining largely ineffective, serious concerns emerged regarding the practical implementation of the new regime. Similar doubts were raised due to the absence of a timeframe, as well as an action plan, which traditionally accompanies strategic documents. The document was further criticized for encouraging a single understanding of TCNs, instead of adopting tailored policies for different subgroups of migrants according to a set of criteria, such as age, duration of sojourn, or country of origin (Report of public consultation on the National Integration Strategy 2019).

Despite its weaknesses, the strategy has been a welcome addition to a rather limited body of legal documents that address integration. Perhaps most importantly, the new strategy posits that social integration is a complex concept that unfolds on two levels: the reception of applicants of international protection, and the integration of beneficiaries of international protection, as well as migrants (National Integration Strategy, 2019). In other words, the integration of TCNs does not commence at the moment that international protection is being granted but much earlier, at the moment of arrival in Greece. The document also lays out the axes of integration policy, which include access to fundamental services (such as housing, adequate information, healthcare); integration in education; access to the labor market, interculturalism, civic participation; and a small number of policies dedicated to the key role of the local administration and the adoption of special measures for vulnerable groups of TCNs. This classification agrees with the dominant understanding of social integration in the literature as a multi-faceted phenomenon (Ager and Strang 2008).

Finally, the second half of 2019 constituted a benchmark in migration governance in Greece. Following the elections of July 2019, a new government was formed by the conservative party 'New Democracy' which had been pushing for a tougher and more securitized agenda on migration for years. Only days after 'New Democracy' came to power, the operation of the Ministry for Migration Policy ended and all its competences were transferred to the Ministry for Citizen's Protection. In the four-point plan presented by the Prime Minister in October 2019, securitization of borders was listed among the objectives to enhance the overburdened asylum system, to strengthen the cooperation of public authorities and to relieve pressure on the islands. Integration was left out of this list (Bourdaras 2019).

The shift towards a stringent stance on migrants was also reflected in Law 4636/2019, which established a uniform regime on the status of applicants and beneficiaries of international protection in the country. In a glimpse, the new act accelerates first instance and appeals procedures; it establishes constraints to healthcare access for asylum seekers; it adopts punitive measures for families with children who do not attend school; and it extends conditions of detention. With regard to integration, perhaps the most important change was the introduction of a grace period of six months for the exit of recognized beneficiaries from the accommodation facilities, which was further reduced to one month in March 2020 (Article 114 Law 4674/2020). The document was denounced, almost unanimously, by both NGOs and international agencies for posing a severe threat to the protection of the fundamental rights of the persons falling under its scope (UNHCR 2019). In the same vein, the role of NGOs in the field of migration was redefined with the configuration of a new online registration system, which established onerous certification procedures and provided new grounds for the cooperation with the State (Law 4662/2020). The Expert Council on NGO Law has twice condemned this system for being incompatible with European standards, especially for violating the right to free

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association (Expert Council on NGO Law 2020a; Expert Council on NGO Law 2020b).

Integration Pillars

Housing

The 2019 framework foresaw three different forms of housing for asylum seekers: in reception premises at the national borders (this was particularly the case when the EU-Turkey agreement was in place); in accommodation centers, managed by state authorities, NGOs or international organizations guaranteeing adequate conditions of living; and private houses, apartments or hotels available within the frame of funded housing programs (Article 56 Law 4636/2019). As the housing environment is currently shaped in Greece, the first two forms described in the provision refer to RICs, the Reception and Identification Centers, as well as the 32 accommodation sites dispersed throughout the mainland. Despite state and private efforts for the upgrade of living standards through site management support (SMS), accommodation in camps is routinely considered an unfavorable housing scheme for the protection of asylum seekers (Kourachanis 2018).

Beyond the in-site accommodation, the two main housing programs in place for several years, FILOXENIA and ESTIA I (Emergency Support to Integration and Accommodation Program), were exclusively reserved for asylum seekers. In what has been characterized as a novelty at the global level by experts, ESTIA I entailed the practice of direct apartment rentals in dispersed areas within urban centers to accommodate vulnerable asylum seekers.

Refugees are entitled to housing on the same terms and conditions as TNCs legally residing in the country (Art. 34 Law 4636/2019). One may conclude that the provision shapes a more inclusive framework compared to asylum seekers. However, this is not the case. Until recently, refugees were allowed to remain in accommodation sites or apartments of ESTIA I, even after having obtained their residence permit. Law 4636/2019 ended this tolerant stance, by stipulating that refugees are obliged to leave the accommodation structures within 6 months from the moment of recognition of their asylum status. In 2020, this deadline further shrank to one month, a decision taken unrelated to the COVID-19 pandemic. Under this light and taking into account that no social housing policy exists in Greece, refugees may only benefit from the "HELIOS" program, which provides financial assistance to promote independent living and integration of refugees in the social web.

Physical and mental health

Against the post-2014 humanitarian crisis backdrop, amendments were introduced in the national normative framework concerning access to healthcare. In response to the country's label as a 'welfare state,' Article 33 Law 4368/2016 included a vision of universal health coverage, which enables all vulnerable social groups to fully access the public healthcare system and receive nursing and medical treatment free of charge. Both asylum seekers and refugees are explicitly classified as vulnerable individuals under this provision, contrary to irregular migrants who remain outside the scope of this provision, as they are only entitled to emergency healthcare.

The newly established Law 4636/2019, in Art. 31 par. 1, placed refugees on equal footing with Greek nationals with regard to healthcare access, which effectively verified the need of a social insurance number (AMKA) in order to be able to receive treatment in the public healthcare sector. For asylum seekers, this has not been equally straightforward. Although Law 4368/2016 granted free healthcare access, there was no clarification as to whether this group is eligible for obtaining AMKA. A Joint Ministerial Decision later in 2016 established an alternative document, the Foreigner's Health Care Card (KYPA), for those vulnerable groups clustered in Article 33 Law 4368/2016 who did not qualify for an AMKA. However, the KYPA system was never implemented, and asylum seekers continued to apply for AMKA to gain access to the national health system.

In July 2019, the new government revoked the circular regulating the procedure to issue AMKA to non-nationals. Pending a new regime that would not be introduced until 6 months later, this executive action meant that asylum seekers were banned from access to public health facilities, a practice that was condemned by national and international actors as a clear violation of their fundamental right to health (among others, Amnesty International

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2019). Finally, a new state institution provided for unlimited access to public healthcare for asylum seekers with the issuance of a Temporary Insurance and Foreigner's Healthcare Number (PAAYPA), valid until the Asylum Service's decision on their application (Art. 55 Law 4636/2019 and Art. 15 of the Ministerial Decision 717 (OGG B' 199/31.01.2020). Notably, the same law deals not only with access to healthcare, but also encompasses safeguards for the healthy living conditions of these populations.

Employment

According to Art. 71 Law 4375/2016 in its original form, asylum seekers are entitled to access to wage employment and service or work provision, provided they have obtained a valid asylum card. This marked a significant advance along the road to integration; unlike the previous regime, a work permit is no longer required and Greek nationals were no longer legally prioritized over foreign employees. However, the provision was soon amended by Art. 53 Law 4636/2019, which introduced a six-month time limit, from the moment of application submission, for asylum seekers to gain 'effective access' to the labor market. This new restriction was met with severe criticism for hindering, instead of facilitating, self-sustainment of individuals seeking international protection (Greek Ombudsman, 2019). For refugees with a valid residence permit, the limitation does not apply; access to wage and self-employment is granted without a work permit, on the same terms as for Greek nationals (Art. 69 Law 4375/2016 and Article 27 Law 4636/2019), with an exception regarding working in the public sector.

In essence, every individual who wishes to enter the Greek labor market, regardless of the type of employment they may pursue, needs to have a tax registration number (AFM) and a national security number (AMKA) or PAAYPA, for asylum seekers. Hence, in revoking the asylum seekers' entitlement to AMKA in the second half of 2019 and prior to the insertion of the PAYYPA regime, the state effectively hampered access not only to healthcare, but also to employment for this population.

Equal treatment with Greek nationals is also granted in access to vocational training, internships and consulting, as well as the recognition of foreign diplomas and other qualifications (Articles 29 and 54 Law 4636/2019 for beneficiaries of international protection and asylum seekers, respectively). In the event that supporting documents cannot be provided, beneficiaries are permitted to participate in programs aimed at assessing their skills, in compliance with EU Directive 2005/36/EC on the recognition of professional qualifications (transposed by the Presidential Decree 38/2010). For asylum seekers who reside in Reception and Identification Centers (RICs) or temporary accommodation sites, vocational training and consulting may also be provided within the premises of those structures as a measure to foster social integration (Art. 15 of the Ministerial Decision 23/13532/2020 – Official Gazette B' 5272/30.11.2020).

Gaps in Migrants' Integration Governance and Policy Implementation: A View from the Field

General comments on integration

Asylum seekers appear to have more access to services than refugees:

If you think in a logical way, you expect as an asylum seeker to have some rights and access to different things, but generally there is this idea that when you are a recognized refugee, you have more access and more rights. From what I understand from the population we see every day, it is more difficult to be a recognized refugee than an asylum seeker (Athena, 6 November 2020).

The logic of the Greek government is that since someone is a recognised refugee, they have access to the same services provided to a Greek citizen. So why would they provide you with more cash assistance and more accommodation, when they are not providing the other citizens the same? (Kostantinos, 7 October 2020).

The concept of integration has been inherently linked to the concept of dependent living of refugee populations, creating expectations for the provision of assistance indefinitely

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Generally, there was a concept in the whole system and in beneficiaries' minds that they will stay in the program forever. However, at some point, the law changed. [...] This was not explained to the beneficiaries at the start, that this is something temporary (Danae, 24 August 2020).

The most important thing is for these people to understand that they will not remain under the umbrella of international protection forever. At some point, they will have to start leading their lives here (Andreas, 17 September 2020).

Language lessons are neither mandatory during the first stage of integration nor available at all temporary placements. There is a need for language courses to become mandatory from the reception stage onward, both to aid integration and to encourage self-reliance among program beneficiaries.

To become a beneficiary of the HELIOS program, one needs to attend language lessons. I think it's too late to start considering this after one becomes a recognized refugee. Learning the language needs to be a condition from the start of the ESTIA program (Danae, 24 August 2020).

It should have been mandatory to take Greek or English courses from the very beginning. One needs to be able to find a way to communicate (Anna, 1 September 2020).

Teenagers at the age of 15-18 [...] cannot even answer to which school they go to. [...] They cannot do their homework at all because their level of Greek language is not just primary, it is non-existent (Stella, 13 October 2020).

I believe there is a very limited number of Greek language classes offered right now. There is not enough support in this area for free. [...] Additionally, the classes offered are only for beginners. To achieve a more advanced level of speaking the language, beneficiaries need to pay privately (Athena, 6 November 2020).

There is a need for more organized training to identify skills and abilities of refugees and asylum seekers:

There should be more educational programs, in order to give beneficiaries the opportunity to learn some type of skill; or properly interview them, in order to understand what they can offer back to you, what are their skills and abilities (Anna, 1 September 2020).

Housing

Although the vast majority of the interviewees referred to housing as one of the most important pillars of integration, in practice integration is not treated as a primary goal at the first stage of reception: 'The ESTIA's goal is first and foremost to accommodate and then integrate. Integration is applied as a secondary goal only' (Danae, 24 August 2020). As the ESTIA program was a novel migration governance tool, the implementing organizations are the only ones with the know-how of its effective operation.

The Ministry wishes to involve actors that can bring the know-how in several aspects of migrant integration (Stella, 13 October 2020).

The government said that they wanted to include new and inexperienced NGOs in accommodation programs. This means that they will not have the necessary 'know-how' to avoid past mistakes. The handover needs to be done keeping this in mind to avoid repetition of the same mistakes (Kostantinos, 7 October 2020).

In its original release, the ESTIA II program was designed with a sharp decrease in the budget. In this light, concerns have been raised regarding the quality of services and capacity of the state and the few NGOs that expressed willingness to participate, to accommodate the needs of beneficiaries.

The budget set by the Ministry doesn't even come close to the UNHCR's one. As a result, NGOs refrain from applying to continue with ESTIA II [...] In Thessaloniki there are about 1,000 houses under ESTIA. 60%-70% of them

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are not managed by any organization now (Andreas, 17 September 2020).

For the NGOs that are going to remain in the program, as the budget is a lot smaller than before, they need to reduce the staff a lot. So there is a question regarding the quality of the program (Danae, 24 August 2020).

HELIOS poses challenges with regard to housing for refugees. These stem from the limited personal scope of HELIOS to previously self-accommodated asylum seekers; the lack of proper documentation, of the limited understanding of the accommodation procedures and of the financial capacity of refugees to rent apartments on their own; and the reluctance on the part of homeowners to have non-nationals as renters.

There are specific conditions to enter the program, such as having a housing contract, which means that the beneficiaries must have the money in order to pay for a deposit, which in some cases is more than one month's rent in advance. The organizations are trying to help them find and book houses [...] but there is an issue with covering the expenses for the upfront rents on the side of the refugees (Danae, 24 August 2020).

Self-accommodated asylum seekers becoming refugees turn mostly into homeless people. They are considered by the government as self-sustained people, so they [are believed to] have no need of an integration program such as HELIOS (Danae, 24 August 2020).

Health

In the field of health, the major threat that migrants have been faced with since the beginning of 2020 has been the COVID-19 pandemic, not as a health issue *per se*, but rather as a matter of accessing services and being able to benefit from on-site help due to prolonged and repetitive lockdowns.

The pandemic has caused severe delays and suspensions in the provision of services.

[...] Everything got delayed so everything that was going already slowly, it stopped at that point. [...] The moment the prevention measures started, it made most of the public sector shut down. In the sense that hospitals were not accepting visitors anymore, even for the slightest thing, schools were closed for the students, public service offices that could provide assistance, such as those offering social security numbers, were closed, NGOs were mandatorily informed that they were not allowed to receive more than a certain limit of people per day (Konstantinos, 7 October 2020).

The shift in the operation of organizations in the field had both a negative and a positive effect on the delivery of services to beneficiaries.

The office was closed; we were working from home. We did not have direct contact with the beneficiary, to see each other and understand what exactly their needs are. This has been a huge problem, especially in the domain of housing (Andreas, 17 September 2020).

We had to change certain activities to limit physical contact with the beneficiaries due to covid-19, which also decreased the amount of information that we obtained but increased the amount of workload. [...] Since things are happening remotely, things sometimes are more efficient, as many NGOs have found a way to limit or even completely take out a task that was very time-consuming (Konstantinos, 7 October 2020).

Access to health services for regular check-ups and non-COVID related conditions has been especially hard during the pandemic.

The hospitals are running at full capacity right now, so you cannot make appointments. It is very difficult. The other day, I obtained an appointment at the hospital, and I was very happy. The only thing that's working in the hospital is the emergency shift. Everything is really impacted during this period. [...] It's very difficult to arrange an appointment to the doctor at the present, because the number of available appointments is down by 50% of what they used to be.

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Some of the hospitals are not now even accepting new appointments (Athena, 6 November 2020).

For refugees and asylum seekers, the situation becomes even more cumbersome due to the shortage of interpreters in healthcare facilities.

Some of the hospitals operate with translators, but not all of them. There are only specific ones that are supported by METAdrasi and there are very few hospitals this period who are getting this support (Athena, 6 November 2020).

Employment

Access to the labor market for asylum seekers and refugees is mostly limited to professions related to interpretation. 'There are not actually a lot of jobs available for this population, other than cultural mediators and interpreters. Maybe if they studied, they might find relevant employment' (Danae, 24 August 2020). Access to local labor market/local industries can be key to integration within the community.

In Veroia, for example, where they have fields with peaches and factory, they ask beneficiaries to learn how to use the machines in the factory and start working there. It had a very good impact in the society of Veroia, they felt very embraced and welcome there (Anna, 1 September 2020).

Expectations on employment need to take into account the cultural and societal background of the populations.

If you have a single mother with five underage children, how will this woman, who never worked in her life because her society raised her to be like that, how would you get her a job? There was a huge (effort) to train these women and get them to make money on their own. And for them, it was too much of a responsibility (Anna, 1 September 2020).

Conclusions

The current Greek integration policy has been developed based on EU migrant integration policies pertinent to the broader concept and regulations of migration governance, adapted to the specificities of the Greek legal framework. Due to the securitization of migration governance both at the EU and national level, priority has been set on deterrence of illegal migration, rather than the integration of refugees and asylum seekers into Greek society. In the post-2014 context, inevitably the focus of national and supranational legislative efforts partly shifted away from deterrence of irregular migration, and towards the entry, stay and integration of applicants and beneficiaries of international protection. Nonetheless, the advent of "New Democracy" to power in 2019 reinstated a more securitized agenda on migration governance favoring border controls in order to enhance the overwhelmed asylum system and relieve pressure on the islands, while overlooking the development of integration policies.

The national integration strategy and subsequent legal documents have conceptualized 'integration' as a two-step process, consisting of the reception of people pending a decision on their asylum application, and the integration of those who have been recognized as beneficiaries of international protection. Sadly, despite the undeniable value of the introduction of a social integration scheme, the numerous concerns that emerged at the adoption of the new regulatory and policy framework have, by and large, been confirmed in practice. The views from the field attest to the existence of an insufficient integration scheme, both in law and in practice. At a normative level, there are evident pathologies in the domestic legislation, such as the 6-month deadline for exit of recognized refugees introduced by the Law 4636/2019 or the new registry for NGOs. At a policy implementation level, several gaps have been identified with regards to the unbalanced accommodation schemes, the poor employment opportunities and the interruption of services provision in healthcare and other sectors due to the pandemic.

One of the major problems inherent in the implementation of the national integration policies is the creation of aid-dependency in the first stage of reception, which is followed by an abrupt shift to self-sustainment in the second stage of integration of refugees. In essence, asylum seekers are introduced into a system of assisted integration with no prerequisites for receiving financial support, access to services and accommodation. This inevitably gives rise to

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false expectations of a prolonged situation of support by the State or the civil society actors, which clashes with the reality following a positive decision on the asylum application. As a result, recognized refugees are expected to ensure their survival with their own means, let alone provide for their integration as well.

Finally, the change in the role of the third sector in integration governance in Greece enhances the policy implementation gap in integration. INGOs and NGOs have been central in migration management in Greece since 2014. Nonetheless, their role is gradually diminishing, either by being excluded from consultations on policies or by not taking part in new programs due to budgetary decreases. This leads to concerns that precious 'know-how' is lost, especially when it comes to accommodation programs. Likewise, services offered by INGOs and NGOs including, but not limited to, interpreters, psychological support and legal advice, need to be provided by the state soon, as there is an evident gap in such support now. This indicates that the transition of Greece to a destination nation for refugees and asylum seekers is a rather complex, long-term process, which needs drastic changes to bridge the policy implementation gap in integration, including safety nets when it comes to housing or integration into the labor market, as well as close cooperation between the state and the third sector.

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